

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

DEBORAH GRAY, as Next Friend of)
REBECAH BANUELOS,)
Plaintiff,)
v.) Case No. 6:19-CV-338-JFH
ACADIA HEALTHCARE COMPANY,)
INC., and ROLLING HILLS)
HOSPITAL, LLC,)
Defendants.)

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBIT "3" OF
PLAINTIFF'S MOTION TO COMPEL DISCOVERY**

COMES NOW Plaintiff Deborah Gray, as Next Friend of Rebecah Banuelos, by and through her attorneys, CLAGGETT & SYKES LAW FIRM (Sean K. Claggett) FADDUOL, CLUFF, HARDY & CONAWAY, P.C. (Joshua K. Conaway) and MARTINEZ, HART, THOMPSON, & SANCHEZ. P.C. (F. Michael Hart & Kelly Stout Sanchez) respectfully requests leave of Court to file under seal Exhibit "3" of Plaintiff's Motion to Compel Discovery submitted June 18, 2020, pursuant to Local Civil Rule 79.1. In support of this Motion, Plaintiff states as follows:

1. Plaintiff's Motion to Compel Discovery submitted June 18, 2020, contained three attached exhibits, with exhibit "3" including discussion of information which is confidential and raises privacy concern of individuals. In particular, the Exhibit contains names of individuals who are not part of the present lawsuit and their privacy is a concern to both Plaintiff and Defendants. Due to the nature of Exhibit "3" being a police report, the individuals who are not part of the present lawsuit should be protected.
2. Plaintiff and Defendants have discussed and stipulated that Exhibit "3" contains the names of individuals who are not involved with the present lawsuit and protecting their privacy

outweighs the compelling public interest in disclosure of the exhibit.

3. Local Civil Rule 79.1 provides for the sealing of documents “upon a showing that a legally protected interest of a party, non-party or witness outweighs the compelling public interest in disclosure of records.” LCvR 79.1(a).
4. The sealing of Exhibit “3” from Plaintiff’s Motion to Compel Discovery is therefore requested to be entered in the present litigation.

CONCLUSION

For the reasons stated above, Plaintiff respectfully requests that Exhibit “3” from her Motion to Compel Discovery submitted June 18, 2020, be filed under seal.

DATED this 30th day of July, 2020.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 30th 2020, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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